

BLACK & LOBELLO

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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

1597 ASHFIELD VALLEY TRUST, a Nevada Trust;) CASE NO. 2:14-cv-2123-JCM-GWF
 DAVID TOTH and SIRWAN TOTH, Trustees,)

Plaintiffs,)

vs.)

FEDERAL NATIONAL MORTGAGE)
 ASSOCIATION SYSTEM, a Delaware Association;)
 VENTA FINANCIAL GROUP, INC., a Nevada)
 Corporation; OSCAR MORENO, an Individual;)
 DOES, 1 through 25 inclusive; and ROE)
 CORPORATIONS, I through X, inclusive,)

Defendants.)

**AMENDED STIPULATION AND
 ORDER TO EXTEND TIME TO
 FILE RESPONSE TO
 FHFA/FNMA'S MOTION FOR
 SUMMARY JUDGMENT (ECF
 NO. 126]**

(First Request)

FEDERAL NATIONAL MORTGAGE)
 ASSOCIATION SYSTEM,)

Counterclaimant,)

vs.)

1597 ASHFIELD VALLEY TRUST, a Nevada Trust;)
 DAVID TOTH and SIRWAN TOTH, Trustees;)
 HIDDENCREST/PARKHURST COMMUNITY)
 ASSOCIATION, a Nevada non-Profit Corporation;)
 and ABSOLUTE COLLECTION SERVICES, LLC, a)
 Nevada Limited-Liability Company,)

Counterdefendants.)

STIPULATION TO EXTEND

(First Request)

Pursuant to Local Rules 6-1, the parties, by and through their attorneys of record, submit the following stipulation for the Court's review and approval.

1. On August 2, 2016, this Court issued an order denying the FHFA/FNMA's motion for summary judgment without prejudice and directed the FHFA/FNMA to re-file its motion after notifying the Attorney General of Nevada that this action involves a constitutional challenge to Nevada statute. See ECF No. 119.

2. On October 18, 2016, FHFA/FNMA to re-filed its motion for summary judgment. ECF No. 126.

3. On November 14, 2016, Moreno re-newed his response to FHFA/FNMA's motion for summary judgment. ECF No. 130.

4. The parties understand that the inadvertently delayed November 14, 2016 filing resulted from the fact that lead counsel for Moreno is serving in a month-long trial for the entire month of November in Reno, Nevada and failure of synchronization of internal calendars between lead counsel and other staff monitoring the case.

5. The parties agree that this Court should grant Moreno leave to re-new his response and counter-motion for summary judgment (ECF No. 132) because the parties desire to have all remaining claims and issues resolved by motion so necessary appeals may proceed. Moreno may have up to an including November 15, 2016 to file and renew his response to the motion for summary judgment

DATED: November 28th, 2016.

BLACK & LOBELLO

/s/ Maximiliano D. Couvillier, III, Esq.
Maximiliano D. Couvillier, III, Esq.
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10777 West Twain Avenue, Suite 300
Las Vegas, Nevada 89135
Attorneys for Oscar Moreno

DATED: November 28th, 2016.

ALDRIDGE PITE, LLP

/s/ Jory C. Garabedian
Laurel I. Handley, Esq. (SBN 9576)
Jory C. Garabedian, Esq. (SBN 10352)
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Las Vegas, Nevada 89101
Attorneys for Federal National Mortgage
Association and Federal Housing Finance
Agency

DATED: November 28th, 2016.

FENNEMORE CRAIG JONES VARGAS

/s/ Leslie Bryan Hart, Esq.

Leslie Bryan Hart, Esq.

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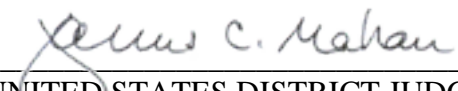
Washington, DC 20001

Attorneys for Defendant FEDERAL

HOUSING FINANCE AGENCY

ORDER

IT IS SO ORDERED that Oscar Moreno's response to FHFA/FNMA's Motion for Summary Judgment (ECF No. 130) shall be due on November 15, 2016.


UNITED STATES DISTRICT JUDGE

DATED: November 29, 2016

NUNC PRO TUNC 11/15/2016

Respectfully submitted:

BLACK & LOBELLO

/s/ Maximiliano D. Couvillier, III, Esq.

Maximiliano D. Couvillier, III, Esq.

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Attorneys for Oscar Moreno

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of November, 2016, I served a copy of the foregoing
**STIPULATION AND AMENDED ORDER TO EXTEND TIME TO FILE RESPONSE
TO FHFA/FNMA'S MOTION FOR SUMMARY JUDGMENT (ECF NO. 126] (First
Request)** through the Clerk's Office using CM/ECF System for filing and transmittal of a Notice
of Electronic Filing to the CM/ECF registrants.

/s/ Shirley Blackburn
An employee of Black & LoBello